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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION EPA CONTRACT 68-01-6669

Mr. Briand C. Wu, Deputy Project Officer September 24, 1986 Emergency Response Section Western Response Unit U.S. Environmental Protection Agency 11th Floor 230 South Dearborn Street Chicago, Illinois 60604

TAT-05-F-01114

Reference: J.E. Berger Corp. Emergency Response,

Detroit, Michigan TDD# 5-8607-14



SECTION

Dear Mr. Wu:

On July 18, 1986, the Technical Assistance Team (TAT) was tasked by the U.S. Environmental Protection Agency (U.S. EPA) to provide support to the On-Scene Coordinator (OSC) during an emergency response involving high PCB contamination at the J.E. Berger Corp. facility, located at 5300 Bellevue, Detroit, Michigan. The following letter report provides a synopsis of events and observations made by the TAT during the response.

The J.E. Berger Corporation is a major motor rebuilding facility with a large inventory of reconditioned motors. This facility also buys and sells dynamometers, controls, transformers and generators.

On July 7, 1986, Mr. Phil Schrantz of the Hazardous Waste Division, Michigan Department of Natural Resources (MDNR), conducted a Toxic Substances Control Act (TSCA) inspection at the J.E. Berger Corp. facility. During the inspection, Mr. Schrantz noted numerous regulatory problems including the presence of capacitors containing polychlorinated biphenyls (PCBs) inside the building and approximately 50 drums, some of which were labeled "recycled transformer oils," at an outside storage area. All the aforementioned drums were subsequently restaged inside the J.E. Berger Corp., building by facility personnel upon completion of Mr. Schrantz's inspection. The capacitors, which had been sold as unused to J.E. Berger Corp., contained PCBs; the capacitors were identified as containing PCBs based on the information supplied on the manufacturer's tag on each capacitor. (See Attachment A for correspondence between the seller and J.E. Berger Corp., concerning the capacitors.) The J.E. Berger Corp., procurred the services of Mr. David Bennett, P.E., to analyze the contents of

the drums and arrange for transportation and disposal of the drummed waste. The contaminated capacitors were to be returned to the McMillan Machinery Co., in Bridgeport, Connecticut, the company that had originally sent them to J.E. Berger Corporation. As part of his inspection, Mr. Schrantz sampled the interior of the building, outside storage areas, and the alley between the two storage areas.

On July 18, 1986 at 1600 hours, Mr. Schrantz received verbal laboratory results indicating the presence of 340,000 ppm of PCB in the alley near the sidewalk bordering Frederick Street. Mr. Schrantz contacted Mr. William Detrich, President, Michigan Industrial Electronics, a division of J.E. Berger Corporation, and Ms. Daria Killinger, attorney for J.E. Berger Corporation, and recommended that site access be restricted immediately and that additional extent of contamination studies would have to be At 1700 hours, Mr. Schrantz contacted Mr. Dan conducted. Patulski, the Region V U.S. Environmental Protection Agency (U.S. EPA) PCB Program Coordinator for the Michigan TSCA cooperative agreement. Mr. Patulski, in turn, contacted On-Scene Coordinator (OSC) Ralph Dollhopf, who was at the Carter Industrial site, and informed him of the developments at J.E. Berger Corp. At this time, OSC Dollhopf requested that the responsible party, their attorneys and contractors, the MDNR, the TAT and the U.S. EPA meet at the site by 1830 hours that same day.

First to arrive at the J.E. Berger site, at 1830 hours, were OSC Dollhopf and TAT members Carla Lange and Craig Bell. A perimeter survey was conducted by the OSC and TAT while they were awaiting the arrival of the other parties. At 2000 hours all parties had assembled and a meeting was held in the J.E. Berger conference room to address the emergency situation at the site and decide on immediate action to be taken. Attachment B includes a listing of attendees at this meeting.

During the meeting, Mr. Charles Smith, Executive Vice President of the J.E. Berger Corp., indicated that J.E. Berger Corp. had procurred the services of Great Lakes Environmental to carry out the cleanup operation, and that Mr. Bennett, P.E., would be retained to conduct an extent-of-contamination study. It was agreed upon by all attendees of the meeting that three immediate measures to be taken at the site should be addressed. These were restricting site access, providing security guards and the placing of sorbents in nearby catch basins. The meeting was concluded at this time to utilize daylight working conditions.

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While site work was being conducted, another meeting was held to determine which lead agency would supervise the cleanup activities. After discussions with Acting Western Response Unit Chief, Briand Wu, and Eastern Response Unit Chief, Robert Buckley, OSC Dollhopf stated that the State of Michigan should assume the lead role in this removal action. After much discussion, the lead state agency named for the cleanup at J.E. Berger was the Groundwater Quality Division of the MDNR. Mr. Brian Monroe of that division was assigned as the individual state contact responsible for the site.

Once the meeting was adjourned, a tour of the facility was offered to everyone by Mr. Smith. The building now used by J.E. Berger was originally the Packard Motor Car Company assembly plant, and covers an area over 200,000 square feet. Most of the space was covered with inventory consisting of motors, switch gear, dynamometers, transformers and generators. Of particular concern at this facility were the 50 drums of waste that had been restaged by the loading dock, the shipment of unused PCB-contaminated capacitors, and the storage of drummed PCB wastes. All concerns regarding proper mitigative techniques were presented to Mr. Monroe at this time by the OSC and the TAT.

In conclusion, all initial site containment and security measures were implemented and the State of Michigan was actively pursuing their lead role on the project. Therefore, the U.S. EPA and TAT assistance were deemed no longer necessary at the site. According to Mr. Monroe, the State of Michigan is in the process of reviewing a J.E. Berger Company's proposal on the work plan that will address sampling and cleanup of both off-site (alleys, streets, backyards, right-of-ways, etc.) and on-site areas including the building, loading dock and all J.E. Berger-owned property.



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If you have any questions or require additional information, please call us at (313) 697-3510.

Very truly yours,

ROY F. WESTON, INC.

Craig L. Bell Environmental Scientist

Scott D. Springer

Technical Assistance Team

Leader, Region V

CLB: amp

ATTACHMENT A

	ACKNOWLEDGEMENT OF COMPLETION FOR TDD TAT EMERGENCY RESPONSE, REMOVAL AND PREVENTION ROY F. WESTON INC. 3278 Abmitted herewith the letter report describing to the OSC during an Emergency Response at	2. NO: G-8607-14 COMPLETE INTERIM FORMAL REPORT LETTER REPORT
J.E. Berger Corporation, Detroit, Michigan. FORMAL BRIEFING OTHER (SPECIFY)		
3A. COST TO DATE: \$400.00 DATE: 07/25/1986 3C. ACTUAL TOTAL HOURS:		
4. DPO ACTION: ACCEPTED ACCEPTED WITH EXCEPTIONS REJECTED		
5. COMMENTS:		
6. I CERTIFY THAT THE ATTACHED MATERIALS MEET AND COMPLY WITH ALL REQUIREMENTS OF THE SUBJECT TDD.		
6A. TATL SIGNATURE AND DATE CORRESPONDING TO 3A. ABOVE 6B. TATL SIGNATURE AND DATE CORRESPONDING TO 3B. ABOVE		
	VE BEEN PROVIDED WITH THE MATERIALS AND SERVICES SPECIFICITS ORIGINAL OR REVISED TIME FRAMES. (AUTHORIZING DPO SIGNATURE)	ED 8. DATE:

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